

Exhibit D

In the Matter Of:

LAURIE ORTOLANO vs

CITY OF NASHUA

CELIA LEONARD

May 13, 2024

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UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW HAMPSHIRE

CIVIL ACTION NO. 22-cv-000326-LM

-----x
LAURIE ORTOLANO,

Plaintiff

v.

THE CITY OF NASHUA, ET AL.,

Defendants
-----x

DEPOSITION OF CELIA LEONARD taken on
behalf of the Plaintiff, pursuant to the applicable
provisions of the Federal Rules of Civil Procedure,
before Lauren M. Buzzerio, a Registered Professional
Reporter, and Licensed Shorthand Reporter, in and
for the State of New Hampshire, at the offices of
Cullen Collimore Shirley PLLC, 37 Technology Way,
Nashua, New Hampshire, on Monday, May 13, 2024.

CELIA LEONARD

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A P P E A R A N C E S

William Aivalikles, Esq.
LAW OFFICE OF WILLIAM AIVALIKLES, P.A.
253 Main Street
Nashua, New Hampshire 03060
(603) 880-0303/william@nhtriallaw.com
Attorney for the Plaintiff

Kurt S. Olson, Esq.
OLSON LAWYERS
31 Franklin Road
Salisbury, New Hampshire 03268
(603) 748-1960/kolson54@gmail.com
Attorney for the Plaintiff

Russell F. Hilliard, Esq.
BROOKE LOVETT SHILO
159 Middle Street
Portsmouth, New Hampshire 03801
(603) 436-7046/rhilliard@upton-hatfield.com
Attorney for the Defendants,
Steven Bolton and Celia Leonard

Brian J.S. Cullen, Esq.
Cullen Collimore Shirley, PLLC
37 Technology Way
Nashua, New Hampshire 03060
(603) 881-5500/bcullen@cullencollimore.com
Attorney for the Defendants,
City of Nashua, Michael Carignan, and Frank Lombardi

Dona Feeney, Esq. (via Zoom)
FRIEDMAN FEENEY, PLLC
95 North Street, Suite 5
Concord, New Hampshire 03301
(603) 783-5105/dfeeney@friedmanfeeney.com
Attorney for the Defendant,
Kimberly Kleiner

CELIA LEONARD

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A P P E A R A N C E S

Michael A. Pignatelli, Esq.
RATH YOUNG AND PIGNATELLI, P.C.
20 Trafalgar Square
Nashua, New Hampshire 03063
(603) 889-9952/map@rathlaw.com
Attorney for James Donchess

ALSO PRESENT:

Laurie Ortolano
Christine Becotte
Steven Bolton

1 they could not do their job with her sitting in our
2 locked offices.

3 Q. And did you tell that to the police?

4 A. That she was being disruptive?

5 Q. No. That you couldn't do your work and it
6 was interfering with your assistants ability to
7 work? Did you tell that to the police?

8 A. Yes, I believe I did.

9 Q. You did. So that would be in their
10 report?

11 MR. CULLEN: Objection.

12 A. I don't know what they choose to put in
13 their report or not. But it was my recollection
14 that I did speak to them and indicate that we could
15 not do the office business with a private citizen
16 sitting there.

17 Q. And even though you made that statement to
18 the police, according to the police report, they
19 felt that there was no crime that was committed?

20 A. The police report speaks for whatever the
21 police report says. So yeah.

22 Q. Did you find it strange that based upon
23 what you told the police that they concluded no

1 somebody was sitting in front of my office. And
2 when I took out my phone to do so, Ms. Ortolano
3 invited me to do so and actually waved at the
4 camera.

5 Q. So you felt that that would be important
6 for the police to see those photographs?

7 A. Yes.

8 Q. And you took those photographs in an
9 effort to document some of your observations?

10 A. Correct.

11 Q. And you had no fear whatsoever pulling out
12 your camera and pointing it at Laurie and taking her
13 picture, did you?

14 A. No fear? No. I was about eight feet
15 away. She couldn't reach me from there.

16 Q. You said that her behavior was erratic.
17 Can you describe her erratic behavior for me?

18 A. Sitting in a locked office after being
19 asked to leave repeatedly by numerous people to me
20 is erratic behavior. She then got up, got agitated
21 walking around, and the re-sat -- and then sat down
22 in front of the other door near the watercooler. I
23 found that erratic.

1 Q. You told the police that you were
2 concerned about recent violent actions against
3 government employees. What incidents were you
4 talking about?

5 A. The January incidents in D.C.

6 Q. And did you equate her sitting in your
7 office area with the January 6th insurrectionists
8 that tried to overturn an election?

9 A. Equate -- yeah. It felt really
10 threatening. And she had two backpacks. I didn't
11 know what was in there. In hindsight, I probably
12 should have told all my staff to get out after we
13 called the police. Because I had no idea what was
14 in those backpacks. There are -- we all have to go
15 through security to go into courts. There's other
16 stuff. City Hall has none of that. I just -- it
17 was threatening and weird.

18 Q. Did you think that she would be a suicide
19 bomber going to City Hall to blow up the place?

20 A. Stranger things have happened. And I'd
21 rather be wrong about that than be right and have us
22 all dead.

23 Q. Well, did she ever say, for example, where